REMARKS

Claims 1-24 are pending in the above-identified application. Claims 1-24 were rejected. Accordingly, claims 1-24 are at issue in the above-identified application.

I.   Objection To Drawings

The Examiner objected to the drawings. This Amendment includes proposed changes to the drawings that address the issues raised by the Examiner.

II.   Objection To Specification

The Examiner objected to the specification. This amendment includes amendments to the specification that address the issues raised by the Examiner.

III.   35 U.S.C. § 103 Obviousness Rejection of Claims

Claims 1-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,202,971 ("Henson et al.") in view of U.S. Patent No. 5,842,213 ("Odom et al."). Applicants respectfully traverse this rejection.

"To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP § 2143.

Regarding claim 1, neither Henson et al., Odom et al., nor Henson et al. in view of Odom et al. teach or suggest all the claim limitations. Specifically, they do not teach or suggest comparing the first file structure to the second file structure.

Firstly, the Examiner did not clarify where the Henson et al. teaches the limitation of "comparing said first file structure to said second file structure." Although page 4, line 9 of the Office action contains the text "(see col. 57-60 et seq)," Applicants are unable to find in Henson et al. any columns numbered "57", "58", or "60." To hasten prosecution, Applicants will speculate that the Examiner meant to write --see col. 13, lines 57-60--.

Assuming that the Examiner intended to assert that the limitation is taught by Henson et al. in column 13, lines 57-60, that passage states "the data structures created by a remote mount operation compare to those created by mounting a local entity in the following ways . . ." Applicants assert that the Examiner is misinterpreting this section of Henson et al. This passage simply uses the word "compare" to describe similarities and differences between two components of Henson et al.'s system. Nowhere does the passage teach or suggest that the system of Henson et al. actually performs a method step of comparing two data structures.

Regarding the Examiner's statement that "Henson does not explicitly indicate the claimed 'transforming file structure'", nowhere does claim 1 recite the limitation "transforming file structure." While claim 1 does recite the limitation "generating one or more changes that transform said first file structure to said second file structure," the claim does not contain any text resembling "transforming file structure." Because of the significant differences between the Examiner's statement and the text of claim 1,

Applicants will not speculate as to what the Examiner intended to write when the Examiner typed "transforming file structure."

Claims 9 and 17 are not unpatentable over Henson et al. in view of Odom et al. for at least the same reasons that claim 1 is not unpatentable over Henson et al. in view of Odom et al. Claims 2-8, 10-16, and 18-24 depend from claims 1, 9, and 17 respectively and are therefore not unpatentable over Henson et al. in view of Odom et al. for at least the same reasons.

Further regarding claim 3, neither Henson et al., Odom et al., nor Hanson et al. in view of Odom et al. teach or suggest "a sequence log of changes." Contrary to Examiner's assertion, this limitation is not taught by Henson et al. in column 23, line 16-27 or column 9, lines 19-24. Column 23, lines 16-27 refers to "filock structures." As explained in column 21, lines 21-37, these are "locks" that specify whether files or sections of files can be read from or written to. Thus, these locks are unrelated to changes that transform the first file structure to the second file structure. Column 9, lines 19-24 teaches information regarding operations performed by a virtual file system. This teaching is also unrelated to changes that transform the first file structure to the second file structure.

IV.   Conclusion

In view of the above amendment and remarks, Applicants submit that all claims

are allowable over the cited prior art, and respectfully request early and favorable

notification to that effect.

Respectfully submitted,

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